

Are there requirements for packaging and marking MOTs?

Yes — except for tanks containing diluted mixtures of a Class 9 material, the packaging must be either the manufacturer's original packaging or a package of equal or greater strength and integrity. The packaging must be marked with a common name (such as "gas" or "spray paint") or a proper shipping name from the HMR (such as Isopropyl alcohol).

In addition, the following requirements apply to MOTs:

- packagings must be leak tight for liquids and gases and sift proof for solids;
- packages must be securely closed, secured against movement and protected against damage;
- outer packagings are not required for receptacles (such as cans or bottles) that are secured against movement in cages, bins, boxes or compartments;
- gasoline must be in DOT or OSHA approved metal or plastic cans;
- cylinders and pressure vessels must conform to the HMR except that outer packagings are not required -- These cylinders must be marked with the proper shipping name and identification number and have a hazard class label;
- if the package contains a reportable quantity of a hazardous substance, it must be marked "RQ"; and
- a tank containing a diluted mixture (not more than 2% concentration) of a Class 9 material must be marked on two opposing sides with the identification number for the material on orange panels or a white square on point configuration.

Where can I learn more?

Visit RSPA's Hazmat Safety Homepage on the Internet to view the HMR, copies of the latest rulemakings, exemptions, clarifications of the regulations, hazmat publications and training schedules.

<http://hazmat.dot.gov>

Download or print related brochures for

Agricultural Operations and **Intrastate Transportation.**



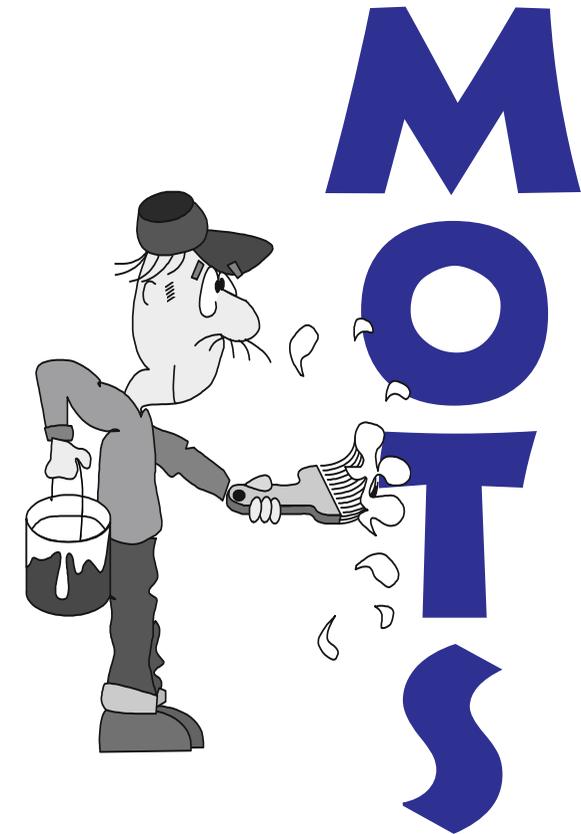
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What Hazardous Materials Regulations Apply to Materials of Trade?



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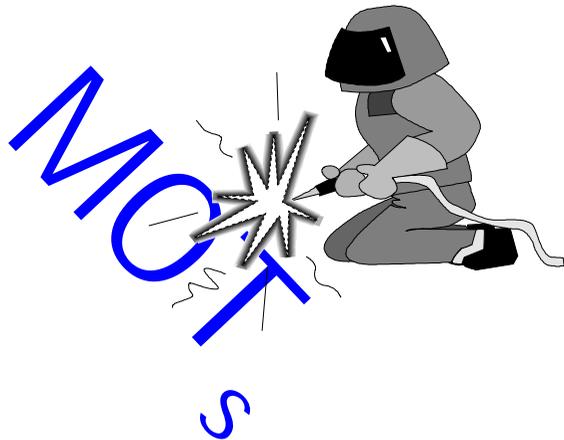
U.S. Department of Transportation

The Hazardous Materials Regulations (HMR) set forth requirements that you must follow if you ship or transport a hazardous material in the course of your business. The HMR tell you:

- how to classify and package a hazardous material;
- how the package must be marked and labeled;
- how to complete a shipping paper;
- how to provide emergency response information that must accompany a hazardous material shipment;
- whether the vehicle in which a hazardous material shipment is being transported must be placarded and the specific placards that must be used; and
- about training requirements for persons who transport hazardous materials or prepare hazardous materials for shipment.

The HMR are published in Title 49, Code of Federal Regulations (49 CFR) Parts 171-180.

Certain hazardous materials transported in small quantities as part of a business are subject to less regulation because of their lesser hazards.



What are Materials of Trade?

Materials of Trade (MOTs) are hazardous materials that are carried on a motor vehicle for at least one of the following purposes:

- to protect the health and safety of the motor vehicle operator or passengers (*examples include: insect repellent, self-contained breathing apparatus, and fire extinguishers*);
- to support the operation or maintenance of a motor vehicle or auxiliary equipment (*examples include: engine starting fluid, spare battery, and gasoline*); or
- when carried by a private motor carrier to directly support a principal business that is not transportation (*examples include: lawn care, pest control, plumbing, welding, painting, door-to-door sales*).

What Regulations apply to Materials of Trade?

The rules that apply to MOTs are found in 49 CFR 173.6 and include:

- general knowledge of MOTs regulations,
- quantity limitations,
- packaging requirements, and
- marking and labeling requirements.

MOTs do not require:

- shipping papers,
- emergency response information,
- placarding, or
- formal training or recordkeeping.

Must I be aware that I am transporting MOTs?

Yes — if you operate a motor vehicle containing MOTs you must know the materials are hazardous, and you must be aware of the requirements for MOTs. However, no formal training, recordkeeping or recurrent training is required.

What Hazardous Materials qualify as MOTs?

Materials of trade are limited to the hazardous materials in the following classes and divisions:

- flammable or combustible liquids (Class 3), *such as paint, paint thinner, or gasoline*;
- corrosive materials (Class 8), *such as muriatic acid, battery fluid, or drain cleaners*;
- miscellaneous hazard materials (Class 9), *such as asbestos or self inflating life boats*;
- flammable gases (Division 2.1), *such as acetylene or propane*;
- non-flammable compressed gases (Division 2.2), *such as oxygen or nitrogen*;
- flammable solids (Division 4.1), *such as charcoal*;
- spontaneously combustible materials (Division 4.2), *such as test kits*;
- oxidizers (Division 5.1), *such as bleaching compounds*;
- organic peroxides (Division 5.2), *such as benzoyl peroxide*;
- poisons (Division 6.1), *such as certain pesticides*; or
- Consumer commodities (ORM-D), *such as hair spray or spray paint*.

Are there any quantity limits for hazardous materials being transported as MOTs?

Yes — except for tanks containing diluted mixtures of a Class 9 material, you may not transport more than 440 pounds (200 kg) of MOTs on any one vehicle, and there are size limits for individual packages:

- if the hazardous material is a high hazard (Packing Group I) material, the maximum amount of material in one package is 1 pound (.5 kg) or 1 pint (.5 L);
- if the hazardous material is a medium or lower hazard (Packing Group II or III) material (other than Division 4.3 or Consumer commodities) the maximum amount of material in one package is 66 pounds (30 kg) or 8 gallons (30 L);
- if the hazardous material is in Division 4.3 (only Packing Group II or III materials are allowed) the maximum amount of material in each package is 1 ounce (30 ml);
- there are no individual package limits for Consumer commodity (ORM-D) materials; and
- each cylinder containing a gas (Division 2.1 or 2.2) may not weigh more than 220 pounds (100 kg).

A diluted mixture of a Class 9 material (not exceeding 2% concentration) may be transported in a tank having a capacity of up to 400 gallons.

